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*Attorneys for Alfred H. Siegel, solely in his
capacity as Trustee of the Circuit City Stores,
Inc. Liquidating Trust*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master Docket No. M:07-1827 SI

MDL No. 1827

THIS DOCUMENT RELATES TO:

Individual Case No. 3:10-cv-05625 SI

ALFRED H. SIEGEL, AS TRUSTEE OF THE
CIRCUIT CITY STORES, INC. LIQUIDATING
TRUST,

Plaintiff,

v.

AU OPTRONICS CORPORATION,
ET AL.

Defendants.

**PLAINTIFF ALFRED H. SIEGEL, AS
TRUSTEE OF THE CIRCUIT CITY
STORES, INC. LIQUIDATING
TRUST'S ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL; SUPPORTING
DECLARATION OF RACHEL S.
BLACK**

[Civil Local Rule 79-5]

ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL; DECLARATION OF
RACHEL S. BLACK

MASTER FILE NO.: M-07-1827-SI
CASE No. 3:10-05625 SI

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 Pursuant to Civil Local Rules 7-10 and 79-5 and the Court's Standing Order, Plaintiff
 3 Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust ("Plaintiff"), by and
 4 through its counsel, respectfully submits this administrative motion for an order permitting
 5 Plaintiff to file under seal portions of Plaintiff's Opposition to Defendants' Motion for Partial
 6 Summary Judgment on Choice of Law and Exhibits 1-43 to the Declaration of Rachel S. Black in
 7 Support of Plaintiff's Opposition.
 8

9 Plaintiff requests that the following documents be filed under seal pursuant to Civil Local
 10 Rule 79-5(d) because they refer to or are documents and testimony that Defendants have
 11 designated "highly confidential" pursuant to the Protective Order governing this action (Dkt. 408,
 12 filed December 7, 2007):
 13

- 14 ■ Portions of Plaintiff's Opposition to Defendants' Motion for Partial Summary
 15 Judgment on Choice of Law and Memorandum of Points and Authorities in
 16 Support Thereof ("Plaintiff's Opposition");
- 17 ■ Exhibits 1-43 to the Declaration of Rachel S. Black in Support of Plaintiff's
 18 Opposition to Defendants' Motion for Partial Summary Judgment on Choice of
 19 Law ("Black Declaration").
 20

21 Plaintiff is filing herewith a redacted copy of Plaintiff's Opposition, in accordance with
 22 Civil Local Rule 79-5. Plaintiff is also filing herewith under seal an unredacted version of
 23 Plaintiff's Opposition, which indicates by highlighting the portions of the document that have
 24 been omitted from the redacted version due to Defendants' "highly confidential" designations.

25 Plaintiff submits this application as the party wishing to file documents referencing,
 26 containing, or analyzing, in whole or in part, the documents described above. Plaintiff attaches
 27

hereto the Declaration of Rachel S. Black in support of this application. Plaintiff takes no position on whether the designated documents satisfy the requirements for sealing. Although Plaintiff's request is narrowly tailored to include only the information that may require confidentiality, it is Defendants' burden to show good cause for sealing the documents by submitting a declaration showing good cause and a proposed order within four days after the lodging of the designated documents. See Civil Local Rule 79-5(e).

Dated: November 4, 2013

SUSMAN GODFREY L.L.P.

By: /s/ Rachel S. Black

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*Attorneys for Plaintiff Alfred H. Siegel, as
 Trustee of the Circuit City Stores, Inc.
 Liquidating Trust*

DECLARATION OF RACHEL S. BLACK

I, Rachel S. Black, declare as follows:

1. I am an attorney at the law firm of Susman Godfrey L.L.P., counsel for Plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust ("Plaintiff"), and am licensed to practice law in the State of Washington and admitted to practice before this Court *pro hac vice*. Except for those matters stated on information and belief, which I believe to be true, I have personal knowledge of the facts stated herein, and, if called as a witness, I could and would competently testify thereto.

2. Plaintiffs' Opposition to Defendants' Motion for Partial Summary Judgment on Choice of Law and Memorandum of Points and Authorities in Support Thereof contains excerpts from and/or statements derived from documents and testimony that Defendants have designated "highly confidential" pursuant to the Protective Order governing this action (Dkt. 408, filed December 7, 2007). Exhibits 1-43 to the supporting Declaration of Rachel S. Black attach documents that Defendants have designated "highly confidential" pursuant to the Protective Order governing this action.

3. Because Civil Local Rule 79-5(b) prohibits the sealing of documents by agreement of the parties, the parties are unable to enter such a stipulation.

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1 4. Therefore, Plaintiff respectfully requests an order sealing the portions of Plaintiff's
2 Opposition to Defendants' Motion for Partial Summary Judgment on Choice of Law and
3 Memorandum of Points and Authorities in Support Thereof; and Exhibits 1-43 to the Declaration
4 of Rachel S. Black in Support of Defendants' Motion for Partial Summary Judgment on Choice
5 of Law, and the exhibits thereto.

7 I declare under penalty of perjury under the laws of the State of Washington and the
8 United States that the foregoing is true and correct.

9 Executed this 4th day of November, 2013, at Seattle, Washington.

11 /s/ Rachel S. Black

12 Rachel S. Black